

NOTICE OF VIOLATION

Southern California Edison Company
San Onofre Units 1, 2 and 3

Docket No. 50-206,361,362
License No. DPR-13, NPF-10,
NPF-15

During an NRC inspection conducted on May 13 through June 23, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

1. 10 CFR Part 50, Appendix B, Criterion V, specifies that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.
 - a. Procedure S0123-XVIII-23, TCN 0-1, "Implementation Of Site Housekeeping And Cleanliness Controls," Paragraph 6.4.1.5, specified that, "Excess materials or equipment (such as hoses, portable gear, tools, ladders, temporary power cables) not in use shall be removed or properly secured, in order to prevent it from becoming a hazard to safety-related equipment or personnel during a seismic event." In addition, procedure S0123-I-1.20, Revision 2, "Seismic Controls During Maintenance, Testing, and Inspection," Paragraph 6.1.1, required that, "Precautions shall be taken to ensure that no tool, material, or any other item capable of damaging a safety-related piece of equipment be allowed to impact any safety-related equipment." It also indicated in Paragraph 6.5.1 that, "All storage containers, gang boxes, welding machines and/or power panels shall be anchored or secured as far away from safety-related equipment as practical when in safety-related areas except when being moved." In addition, in Paragraph 6.2.3 it required that "step ladders, when left unattended, shall be laid down on the floor and secured to a permanent civil structure or, if left standing, tied off in 2 places at or near the top to a permanent civil structure."

Contrary to the above, the following examples were observed in which components were not properly restrained near safety-related equipment:

- On May 17, 1993, a tool cart was left unsecured and unattended near an Emergency Safety Features cabinet behind the Unit 3 control room panels.
- On May 27, 1993, a ladder was propped up against a pipe while unsecured and unattended within a few feet of component cooling water pump P-025 transfer switch S21804ED005 in Unit 2 Room 23.
- On May 27, 1993, a gang box was left unsecured and unattended within 10 feet of component cooling water piping and transmitters in Unit 2 Room 23.

- On June 5, 1993, a ladder was standing unsecured and unattended next to Unit 2 auxiliary feedwater pump P141.
 - On June 9, 1993, an unsecured and unattended ladder was stored in a scaffolding storage area in Unit 2 component cooling water pump Room 12.
 - On June 9, 1993, scaffolding was left unattended and unsecured within one foot of component cooling water pump P-025 transfer switch S21804ED005 in Unit 2 Room 23.
 - On June 16, 1993, a ladder was standing unsecured and unattended near reactor coolant loop 1A hot leg injection drain valve 2HV9437 on the 17 foot elevation of the Unit 2 containment.
 - On June 16, 1993, an equipment box was secured to a safety-related electrical conduit, CABJ13, on the 45 foot elevation of Unit 2 containment (near column 5).
 - On June 24, 1993, a ladder was standing unsecured and unattended behind 480V safety-related switchgear in the Unit 1 4160 VAC switchgear room.
- b. Procedure S0123-XXVI-14.120, Revision 1, "Construction/Testing Aids," Paragraph 6.2.1.2, required that "A new Scaffolding Safety Evaluation shall be generated for revisions to existing scaffolding unless the modifications are minor in nature and do not extend the scaffolding over any additional plant equipment."

Contrary to the above, as of May 27, 1993, work was being performed under design change package (DCP) 2-6863, "Containment Spray Cross-Tie," when an interference was encountered with installed scaffolding. As a result, Bechtel craft modified the scaffolding by replacing the interfering vertical member with two additional members. The new members were supported from safety-related containment spray pipe supports S2-SI-004-H-0017 and 0019. However, no engineering evaluation of the modification was performed to determine if the load addition was within acceptable limits.

These examples are considered a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Southern California Edison Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Senior Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason

for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, the Commission may issue an order or a Demand for Information as to why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Where good cause is shown consideration will be given to extending the response time.

Dated at Walnut Creek, California
this 21 day of July, 1993